BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

Docket No. 2016-60-E

In re:)	
)	
Julie Jenkins Teague,)	
Complainant/Petitioner,)	AFFIDAVIT OF
)	BARBARA YARBROUGH
v.)	
)	
Duke Energy Carolinas, LLC,)	
Defendant/Respondent.)	

PERSONALLY appeared before me, Barbara Yarbrough who first being duly sworn did state as follows:

- 1. My name is Barbara Yarbrough and I am Regulatory Affairs Manager for Duke Energy Carolinas, LLC ("Duke Energy Carolinas"). I am responsible for directing the proper administration of Duke Energy Carolinas' rate schedules and service regulations and the Public Service Commission of South Carolina's ("Commission") rules and regulations. I am also responsible for the investigation of customer complaints received through the Commission and the Office of Regulatory Staff ("ORS").
- 2. This affidavit is based upon my personal knowledge and review of documents received and maintained in the ordinary course of business by Duke Energy Carolinas. I am familiar with the records of Duke Energy Carolinas that pertain to Julie Jenkins Teague. I have personally worked on said documents and records, and as to the following facts, I know them to be true of my own knowledge or I have gained knowledge of them from the business records of Duke Energy Carolinas, which were made at or about the time of the events, recorded, and which are maintained in the ordinary course of business by Duke Energy Carolinas.

- 3. I assisted our attorneys in preparing Duke Energy Carolinas' Motion for Summary Judgment and Memorandum in Support ("Motion"). I have read the Motion and verify that the information contained within the Motion is accurate and true to the best of my knowledge, information, and belief.
- 4. DEC provided ORS with the billing history of Ms. Teague as requested by ORS during its investigation of Ms. Teague's complaint. That billing history for January 2013 through December 2015 was attached to Ms. Teague's complaint and is attached as **Confidential Exhibit** 1 of the Motion. The billing history is a true and accurate compilation of records maintained by DEC in the ordinary course of business.
- 5. The DEC letter to ORS dated January 12, 2016, attached to the Motion as **Exhibit** 2, and the ORS letter report to Ms. Teague dated January 15, 2016, attached to the Motion as **Exhibit 3** are true and accurate copies of records maintained by Duke Energy Carolinas in the ordinary course of business.
- 6. I provided the kilowatt hour history of Ms. Teague for the period from January 2005 through December 2015 that is attached to the Motion as **Confidential Exhibit 4.**
- 7. Duke Energy Carolinas' billing period for November 13, 2015, through December 15, 2015, ("December Billing Period) had 3 more days in the billing period than the previous billing period ("November Billing Period"). The December Billing Period was for 32 days and the November Billing Period was for 29 days.
- 8. Duke Energy Carolina's December Billing Period was also 110% colder than the November Billing Period. One way to compare the energy used over periods is to measure degree days. Degree days are based on the assumption that when the outside temperature is 65°F, neither heating nor cooling is needed to be comfortable. A degree day is the difference between

65°F and the average of the high and low temperatures in a given day. The December Billing Period had 362 degree days versus 173 in the November Billing Period. The higher the number the more energy would be used for heating during the period.

FURTHER AFFIANT SAYETH NOT.

Dated this <u>Agrd</u> day of February, 2016.

DUKE ENERGY CAROLINAS

Barbara G. Yarbrough

Regulatory Affairs Manager

SWORN TO BEFORE ME

This 22 day of February, 2016.

Print Notary Name: Patricis C. Ross

Notary Public for Mecklenburg County

My Commission Expires: 10-17-2019

PATRICIA C. ROSS NOTARY PUBLIC Mecklenburg County North Carolina